

Dunn, Bettina

From: Mastro, Donna
Sent: Thursday, December 14, 2017 6:48 AM
To: wentworth, paul; duke, gerallyn
Subject: RE: EPA Comments on Philly Shipyard Paint Hall Project - The company's analysis and calculation detail

Exemption 5-Attorney Client



Donna L. Mastro | Associate Regional Counsel | Air Branch Chief | US EPA Region III ORC | (215) 814-2777

From: wentworth, paul
Sent: Wednesday, December 13, 2017 4:37 PM
To: Mastro, Donna <Mastro.Donna@epa.gov>; duke, gerallyn <duke.gerallyn@epa.gov>
Subject: FW: EPA Comments on Philly Shipyard Paint Hall Project - The company's analysis and calculation detail

Exemption 5-Attorney Client



From: Edward Wiener [<mailto:Edward.Wiener@phila.gov>]
Sent: Friday, December 01, 2017 9:14 AM
To: wentworth, paul <wentworth.paul@epa.gov>
Subject: RE: EPA Comments on Philly Shipyard Paint Hall Project

Paul,

I haven't explained the situation well. They did a detailed investigation, met with us about it, recalculated past emissions when necessary, and came up with a new emission tracking process. I just summarized it to they found out they were calculating emissions before all of their usage reports were submitted.

Attached are a flow diagram for their new tracking process and their letter explaining everything. Let me know your thoughts. I don't think we want to put anything too detailed in the plan approval, plus we don't want to go through the permitting process if they change some of the details. I don't have any great ideas for added language to the plan approval, outside of possibly a requirement to use an AMS-approved emission tracking and calculation process.

Edward Wiener

Air Management Services

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From: wentworth, paul [wentworth.paul@epa.gov]
Sent: Thursday, November 30, 2017 4:52 PM
To: Edward Wiener
Subject: RE: EPA Comments on Philly Shipyard Paint Hall Project

Ed: I think we remain concerned that there appears to be a token attempt to address the perceived monitoring deficiency. I think that it is reasonable to request a clear explanation from the facility of where their process broke down and what they are doing to correct this issue. Up to now, I don't think they have provided a satisfactory explanation. That's the first thing to get from them and have it included in the fact sheet. What do you think? I agree with you that they should include details of their recordkeeping process and keep account of the process maybe with a simple check sheet. Also we only suggested they consider the 365 rolling method as one of other possible methods. Could they provide a monthly report of the total combined emissions of VOC and VOHAP for a specified period time, say 1-2 years and if satisfactory then change to quarterly? What's your thought on this?

Regards

From: Edward Wiener [<mailto:Edward.Wiener@phila.gov>]
Sent: Wednesday, November 29, 2017 1:47 PM
To: wentworth, paul <wentworth.paul@epa.gov>; Rahel Gebrekidan <Rahel.Gebrekidan@phila.gov>
Cc: Aquino, Marcos <Aquino.Marcos@epa.gov>; Maryjoy Ulatowski <Maryjoy.Ulatowski@phila.gov>
Subject: RE: EPA Comments on Philly Shipyard Paint Hall Project

Paul,

Philly Shipyard has proposed adding the following requirement:

"The Permittee shall submit to AMS quarterly reports which include total combined emissions of VOC and VOHAP from the emissions sources identified in Condition 3 of this Plan Approval for the previous twelve-months."

They don't believe a rolling 365-day limit would have caught the last problem because it was a data acquisition issue. I suggested adding some of their new recordkeeping system details into the plan approval, but they are concerned that they would then have to keep records demonstrating compliance with their recordkeeping records. They would also have to go through permitting every time they wanted to change their recordkeeping process.

Is EPA OK with this?

Edward Wiener

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From: wentworth, paul [wentworth.paul@epa.gov]

Sent: Monday, November 20, 2017 4:46 PM

To: Edward Wiener; Rahel Gebrekidan

Cc: Aquino, Marcos

Subject: EPA Comments on Philly Shipyard Paint Hall Project

Ed and Rahel: Attached are EPA's comments on the Philly Shipyard Paint hall project. Please feel free to contact me if you have any questions or concerns.

Thank you!

Paul T Wentworth, P.E.

Senior Environmental Engineer

EPA Region 3

Air Protection Division

Phone: 215-814-2183

Between stimulus and response there is a space. In that space is our power to choose our response. In our response lies our growth and our freedom.

[Viktor E. Frankl](#)